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HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090002
Agency Interest No. 26802

Mr. Walter Ferguson
Senior Vice President
CenterPoint Energy Gas Transmission Company
1111 Louisiana
Houston, TX 77002

RE: Part 70 Operating Permit Renewal/Modification, CenterPoint Energy Gas Transmission Company - Ruston Storage Station, Ruston, Lincoln Parish, Louisiana

Dear Mr. Ferguson:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the ____ of _____, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2009.

Permit No.: 1720-00028-V5

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
SGQ

c: EPA Region VI

Post Office Box 4313 • Baton Rouge, Louisiana 70821-4313 • Phone 225-219-3181 • Fax 225-219-3309

www.deq.louisiana.gov

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
CENTER POINT ENERGY FIELD SERVICES, INC.
RUSTON STORAGE COMPRESSOR STATION
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL/MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Part 70 Air Operating Permit Renewal/Modification for CenterPoint Energy Field Services, Inc., P.O. Box 21734, Shreveport, Louisiana 71151 for the Ruston Storage Compressor Station. **The facility is located approximately 8 miles north of Ruston on the left side of Howard Road, Ruston, Lincoln Parish.**

CenterPoint Energy Field Services, Inc. requested a renewal/modification to the Part 70 Air Operating Permit for the Ruston Storage Compressor Station.

The Ruston Storage Compressor Station is a natural gas transmission facility that compresses gas from incoming pipelines into a nearby underground storage field. Gas also flows through the station when it is returned from the storage field into outgoing pipelines. A 4,000 hp natural gas-fired reciprocating engine is used to drive a compressor which pumps gas through the pipeline system. A glycol dehydrator is used to remove moisture from the gas during withdrawal from the storage field. The emergency generator supplies electrical power as needed. Saltwater separated from the natural gas stream is stored in three tanks and removed from the site via tank truck. Annual natural gas throughput is 3,000 MM scf.

The facility operates under two scenarios. The use of a condenser with non-condensables routed to the reboiler for the control of emissions from the glycol dehydrator still column vent represents Scenario 1. The use of a thermal oxidizer for the control of emissions from the glycol dehydrator still column vent represents Scenario 2.

By this renewal/modification the CenterPoint Energy Gas Transmission Company is proposing the following changes:

1. Include a diesel air compressor engine (Emission Point SN-28);
2. Incorporate a previously permitted tank under a portable Permit No. 7777-00542-00 dated June 13, 2005 for Mississippi River Transmission Corp. as an insignificant activity; and
3. Remove an existing Smart Ash Incinerator (Emission Point SN-20) from the permit as it is no longer located at the facility.

Estimated emissions for Scenario 1 in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	5.68	5.45	- 0.23
SO ₂	0.08	0.26	+ 0.18
NO _x	201.03	201.92	+ 0.89
CO	150.41	150.56	+ 0.15
VOC *	21.16	21.37	+ 0.21

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Total	12.86	12.86	-
Other VOC (TPY):		8.51	

Estimated emissions for Scenario 2 in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	5.94	5.71	- 0.23
SO ₂	0.10	0.28	+ 0.18
NO _x	204.40	205.29	+ 0.89
CO	153.24	153.39	+ 0.15
VOC *	21.35	21.56	+ 0.21

<u>*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):</u>			
<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
Total	12.86	12.86	-
Other VOC (TPY):		8.70	

This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, November 30, 2009.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy may be reviewed at the Lincoln Parish Library, Headquarters, 910 N Trenton Street, Ruston, LA 71270.

Inquiries or requests for additional information regarding this permit action should be directed to Syed Quadri, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3123.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmailrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 26802, Permit Number 1720-00028-V5, and Activity Number PER20090002.

Scheduled Publication Date: October 27, 2009

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Ruston Storage Compressor Station
Agency Interest No.: 26802
CenterPoint Energy Gas Transmission Company
Ruston, Lincoln Parish, Louisiana**

I. Background

CenterPoint Energy Gas Transmission Company - Ruston Storage Compressor Station is an existing natural gas transmission facility whose parent company is CenterPoint Energy Resources Corporation. The Ruston Storage Compressor Station currently operates under Permit No. 1720-00028-V4, issued March 23, 2009.

The facility was issued an Authorization to Construct and Operate dated June 1, 2006, to install a Glycol Dehydrator Unit (Emission Points SN-24 and SN-25) with a higher efficiency and lower capacity reboiler.

This is the Part 70 operating permit modification for the facility.

II. Origin

A permit application was submitted by CenterPoint Energy Gas Transmission Company and received on September 28, 2009 requesting a Part 70 operating permit renewal/modification for the Ruston Storage Compressor Station. Additional information as of October 20, 2009 was also received.

III. Description

The Ruston Storage Compressor Station is a natural gas transmission facility that compresses gas from incoming pipelines into a nearby underground storage field. Gas also flows through the station when it is returned from the storage field into outgoing pipelines. A 4,000 hp natural gas-fired reciprocating engine is used to drive a compressor which pumps gas through the pipeline system. A glycol dehydrator is used to remove moisture from the gas during withdrawal from the storage field. The emergency generator supplies electrical power as needed. Saltwater separated from the natural gas stream is stored in three tanks and removed from the site via tank truck. Annual natural gas throughput is 3,000 MM scf.

The facility operates under two scenarios. The use of a condenser with non-condensables routed to the reboiler for the control of emissions from the glycol dehydrator still column vent represents Scenario 1. The use of a thermal oxidizer for the control of emissions from the glycol dehydrator still column vent represents Scenario 2.

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Ruston Storage Compressor Station
Agency Interest No.: 26802
CenterPoint Energy Gas Transmission Company
Ruston, Lincoln Parish, Louisiana

By this renewal/modification to the CenterPoint Energy Gas Transmission Company is proposing the following changes:

1. Include a diesel air compressor engine (Emission Point SN-28);
2. Incorporate a previously permitted tank under a portable Permit No. 7777-00542-00 dated June 13, 2005 for Mississippi River Transmission Corp. as an insignificant activity; and
3. Remove an existing Smart Ash Incinerator (Emission Point SN-20) from the permit as it is no longer located at the facility.

Estimated emissions for Scenario 1 in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	5.68	5.45	- 0.23
SO ₂	0.08	0.26	+ 0.18
NO _x	201.03	201.92	+ 0.89
CO	150.41	150.56	+ 0.15
VOC *	21.16	21.37	+ 0.21

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,3-Butadiene	0.11	0.11	-
2,2,4-Trimethylpentane	0.12	0.12	-
Acetaldehyde	1.09	1.09	-
Acrolein	1.09	1.09	-
Benzene	1.46	1.46	-
Ethylbenzene	0.02	0.02	-
Formaldehyde	7.77	7.77	-
Methanol	0.35	0.35	-
n-Hexane	0.06	0.06	-
Toluene	0.75	0.75	-
Xylene	0.04	0.04	-
Total	12.86	12.86	-

Other VOC (TPY): 8.51

AIR PERMIT BRIEFING SHEET
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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
Agency Interest No.: 26802
CenterPoint Energy Gas Transmission Company
Ruston, Lincoln Parish, Louisiana

Estimated emissions for Scenario 2 in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	5.94	5.71	- 0.23
SO ₂	0.10	0.28	+ 0.18
NO _x	204.40	205.29	+ 0.89
CO	153.24	153.39	+ 0.15
VOC *	21.35	21.56	+ 0.21

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,3-Butadiene	0.11	0.11	-
2,2,4-Trimethylpentane	0.12	0.12	-
Acetaldehyde	1.09	1.09	-
Acrolein	1.09	1.09	-
Benzene	1.46	1.46	-
Ethylbenzene	0.02	0.02	-
Formaldehyde	7.77	7.77	-
Methanol	0.35	0.35	-
n-Hexane	0.06	0.06	-
Toluene	0.75	0.75	-
Xylene	0.04	0.04	-
Total	12.86	12.86	-

Other VOC (TPY): 8.70

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. The provisions of LAC 33:III.5105.A.1, 3, & 4 and 5113 applies to the Ruston Storage Station because it was a major source upon promulgation of LAC 33:III.Chapter 51, Subchapter A.

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**Ruston Storage Compressor Station
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Ruston, Lincoln Parish, Louisiana**

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, Louisiana and in the *Ruston Daily News*, Ruston, Louisiana on October **, 2009. Written and oral comments received during the comment period from the general public and organizations will be considered before issuing the permit. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on October **, 2009. The draft permit was also submitted to US EPA Region VI on October **, 2009.

VII. Effects on Ambient Air

Emissions associated with the proposed facility/modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
NA			

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Ruston Storage Compressor Station
Agency Interest No.: 26802
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Ruston, Lincoln Parish, Louisiana

VIII. General Condition XVII Activities

Work Activity	Emission Rates – tons/year				
	PM ₁₀	SO ₂	NO _x	CO	VOC
Gas Sampling	-	-	-	-	<1.0
Equipment/Station Blowdown	-	-	<1.0	<1.0	<1.0
Pump Maintenance	-	-	-	-	<1.0
Safety Inspections/Checks on rupture discs	-	-	-	-	<1.0
Safety Inspections/Checks on Pressure/Vacuum vents on tanks	-	-	-	-	<1.0
Inspections on Control Devices	-	-	-	-	<1.0
Service Factors on Control Devices	-	-	-	-	<1.0
Removal of Tank Sludge	-	-	-	-	<1.0
Vessel preparation	-	-	-	-	<1.0
Instrument maintenance	-	-	-	-	<1.0
Tank gauging	-	-	-	-	<1.0
Removal of solids from sumps	-	-	-	-	<1.0
Nitrogen blowing of lines and equipment	-	-	-	-	<1.0
Purging “off-spec” material to control devices	-	-	-	-	<1.0
Changing filters	-	-	-	-	<1.0
Compressor maintenance	-	-	-	-	<1.0
Valve maintenance	-	-	-	-	<1.0
Draining compressor bottles	-	-	-	-	<1.0
Miscellaneous equipment preparation	-	-	-	-	<1.0
Equipment Startups/Shutdowns	-	-	<4.5	<4.5	<4.5

IX. Insignificant Activities

ID No.:	Description	Capacity	Citation
SN-07a	Line Heater Burner No. 1	4.0 MM Btu/hr	LAC 33:III.501.B.5.A.1
SN-07b	Line Heater Burner No. 2	4.0 MM Btu/hr	LAC 33:III.501.B.5.A.1
SN-08	New Engine Oil Tank	7,500 gallons	LAC 33:III.501.B.5.A.3
SN-09	Used Engine Oil Tank	1,500 gallons	LAC 33:III.501.B.5.A.3
SN-11	Glycol Tank No. 1	7,500 gallons	LAC 33:III.501.B.5.A.3
SN-12	Wastewater Tank	8,800 gallons	LAC 33:III.501.B.5.A.3
SN-16	Antifreeze Tank	4,200 gallons	LAC 33:III.501.B.5.A.3
-	Freshwater Tank	6,300 gallons	LAC 33:III.501.B.5.A.3
-	Two Diesel Storage Tanks	500 gallons each	LAC 33:III.501.B.5.D
-	Three Saltwater Storage Tanks	16,800 gallons each	LAC 33:III.501.B.5.A.3
-	Vent (Slop) Tank	532 gallons	LAC 33:III.501.B.5.A.3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
 Agency Interest No.: 26802
 CenterPoint Energy Gas Transmission Company
 Ruston, Lincoln Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5	9	11	13	15	2103	2104	2107	2111	2113	2115	2116*	2121	22	29	51*	53*	56	59
UNF 001	Ruston Storage Compressor Station	1	1	1	1	2					1						1			
EQT 001	SN-01 – 4000 hp Compressor Engine		1	1	1				2											
EQT 007	SN-19 – Tank Truck Loading							2												
EQT 009	SN-21 – Glycol Dehydrator Thermal Oxidizer		1	1	1							1								
EQT 010	SN-22 – 285 gal Methanol Storage Tank					1														
EQT 012	SN-26 – 665 hp Caterpillar G399TA Generator Engine		1	1	1															
EQT 013	SN-25 – Glycol Dehydrator Still Column Vent / Condenser											1								
EQT 014	SN-24 – Glycol Dehydrator Reboiler		1	1	1															
EQT 015	SN-27 – 500 gal Gasoline Tank					1														
EQT 016	SN-28 – 350 hp Diesel Air Compressor Engine																			
FUG 001	SN-18 – Fugitive Emissions		1	1	1					1				2						

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the “Specific Requirements” report specifically states that the regulation is State Only.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
Agency Interest No.: 26802
CenterPoint Energy Gas Transmission Company
Ruston, Lincoln Parish, Louisiana

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
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 CenterPoint Energy Gas Transmission Company
 Ruston, Lincoln Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS								40 CFR 63 NESHAP					40 CFR					
		K	Ka	Kb	GG	KKK	III	JJJ	A	J	V	A	HH	SS	VV	HHH	ZZZZ	52	64	68
UNF 001	Ruston Storage Compressor Station																			
EQT 001	SN-01 - Compressor Engine							2												
EQT 007	SN-19 - Tank Truck Loading																			
EQT 009	SN-21 - Glycol Dehydrator Thermal Oxidizer																			1
EQT 010	SN-22 - Methanol Storage Tank							2												
EQT 012	SN-26 - Caterpillar G399TA Generator Engine									2										
EQT 013	SN-25 - Glycol Dehydrator Still Column Vent / Condenser																			
EQT 014	SN-24 - Glycol Dehydrator Reboiler																			1
EQT 015	SN-27 - Gasoline Tank							2												
EQT 016	SN-28 - 350 hp Diesel Air Compressor Engine																			
FUG 001	SN-18 - Fugitive Emissions																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
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- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Ruston Storage Compressor Station
 Agency Interest No.: 26802
 CenterPoint Energy Gas Transmission Company
 Ruston, Lincoln Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		Notes
ID No:	Requirement	
UNF 001	Emission Standards for Sulfur Dioxide [LAC 33:III.1502.A.3] NESHAP, Subpart HH - Oil and Natural Gas Production Facilities [40 CFR 63.760] NESHAP, Subpart HHH - Natural Gas Transmission and Storage Facilities [40 CFR 63.1270(a)]	DOES NOT APPLY. No single point source at this facility has the potential to emit 5 tons per year or more of sulfur dioxide. DOES NOT APPLY. This facility is not a Natural Gas Production Facility DOES NOT APPLY. This facility is not a major source of HAP emissions.
EQT 001 SN-01 Compressor Engine	NSPS, Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230(a)(4)] NESHAP, Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6590(b)(3)] Control of Emissions of Organic Compounds - Pumps and Compressors [LAC 33:III.2111]	DOES NOT APPLY. The engine is a lean burn engine which was manufactured before July 1, 2007. EXEMPT. This engine is an existing 2-stroke lean burn engine. DOES NOT APPLY. This compressor does not contact VOC with a vapor pressure greater than 1.5 psia.
EQT 012 SN-26 Generator	NSPS, Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230(a)(4)] NESHAP, Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6590(b)(3)]	DOES NOT APPLY. This is an emergency engine manufactured before January 1, 2009. EXEMPT. This engine is an existing 2-stroke rich burn emergency engine.
SN-18 Fugitives	Control of Emissions of Organic Compounds [LAC 33:III.2121.A]	DOES NOT APPLY. This facility is not a natural gas processing plant.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		Notes
ID No:	Requirement	
SN-19 Truck Loading	Control of Emissions of Organic Compounds from VOC Loading [LAC 33:III.2107.A.1]	DOES NOT APPLY. This facility does not have a throughput of more than 20,000 gallons per day.
EQT 010 SN-22 Methanol Tank EQT 015 SN-27 Gasoline Tank	NSPS, Subpart Kb – Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. Tanks have a nominal capacity less than 75 m ³ .
EQT 016 SN-28 Air Compressor	NSPS, Subpart IIII - Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4200(a)(2)(i)]	DOES NOT APPLY. The engine was manufactured before April 1, 2006.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

General Information
AI ID: 26802 CenterPoint Energy Gas Transmission Co - Ruston Storage Station
Activity Number: PER20090002
Permit Number: 1720-00028-V5
Air - Title V Regular Permit Renewal

ID	Name	User Group	Start Date
1720-00028	CenterPoint Energy Gas Transmission Co - Ruston Storage Station	CDS Number	08-05-2002
01267	Site ID #	Inactive & Abandoned Sites	04-20-1992
32404	Ruston Storage Station	TEMPO Merge	04-07-2002
44556	Arkla Energy Resources Ruston Storage	TEMPO Merge	01-09-2002

Physical Location: 8 Mi N of Ruston, LA 70000

Mailing Address: 1111 Louisiana St
Houston, TX 77002

Location of Front Gate: 32.624167 latitude, -92.610833 longitude, Coordinate Method: Lat./Long. - DMS, Coordinate Datum: NAD83

Name	Mailing Address	Phone (Type)	Relationship
Wayne Ebarb	PO Box 21734 Shreveport, LA 711511734		Accident Prevention Contact for
Wayne Ebarb	PO Box 21734 Shreveport, LA 711511734		Accident Prevention Billing Party for
Walter Ferguson	PO Box 21734 Shreveport, LA 711511734	7132075128 (WP)	Responsible Official for
Walter Ferguson	PO Box 21734 Shreveport, LA 711511734	walter.ferguson@ce	Responsible Official for
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	3184293706 (WP)	Emission Inventory Contact for
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	laura.guthrie@cente	Emission Inventory Contact for
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	3184293927 (WF)	Air Permit Contact For
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	3184293706 (WP)	Air Permit Contact For
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	3184293927 (WF)	Emission Inventory Contact for
Laurie Guthrie	PO Box 21734 Shreveport, LA 711511734	laura.guthrie@cente	Air Permit Contact For

Name	Address	Phone (Type)	Relationship
CenterPoint Energy - Mississippi River Transmission Corp	PO Box 21734 Shreveport, LA 711511734	3184293036 (WP)	Air Billing Party for
CenterPoint Energy - Mississippi River Transmission Corp	PO Box 21734 Shreveport, LA 711511734	3184293927 (WF)	Air Billing Party for
CenterPoint Energy Gas Transmission Co	PO Box 21734 Shreveport, LA 711511734	7132075128 (WP)	Air Billing Party for
CenterPoint Energy Gas Transmission Co	PO Box 21734 Shreveport, LA 711511734	7132075128 (WP)	Owns
CenterPoint Energy Gas Transmission Co	PO Box 21734 Shreveport, LA 711511734	7132075128 (WP)	Emission Inventory Billing Party
CenterPoint Energy Gas Transmission Co	PO Box 21734 Shreveport, LA 711511734	7132075128 (WP)	Operates

Related Organizations:

General Information

AI ID: 26802 CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES
AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station
Activity Number: PER20090002
Permit Number: 1720-00028-V5
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Ruston Storage Compressor Station						
EQT 0001	SN-01 - 4000 hp Compressor Engine		4000 horsepower	4000 horsepower	Natural Gas Fuel	8760 hr/yr
EQT 0007	SN-19 - Tank Truck Loading		12000 bbl/yr	12000 bbl/yr		24 hr/yr
EQT 0009	SN-21 - Glycol Deydrator Thermal Oxidizer		7.7 MM BTU/hr	7.7 MM BTU/hr	Scenario 2 ONLY	8760 hr/yr
EQT 0010	SN-22 - 285 gal Methanol Storage Tank	285 gallons			Methanol	8760 hr/yr
EQT 0012	SN-26 - 665 hp Caterpillar G399TA Generator Engine		655 horsepower	655 horsepower	Natural Gas Fuel	500 hr/yr
EQT 0013	SN-25 - Glycol Deydrator Still Column Vent/ Condenser		90 MM ft ³ /day	90 MM ft ³ /day		8760 hr/yr
EQT 0014	SN-24 - Glycol Deydrator Reboiler		.75 MM BTU/hr	.75 MM BTU/hr		8760 hr/yr
EQT 0015	SN-27 - 500 gal Gasoline Tank	500 gallons		2000 gallons/yr		8760 hr/yr
EQT 0016	SN-28 - 350 hp Diesel Air Compressor Engine		350 horsepower	350 horsepower		500 hr/yr
FUG 0001	SN-18 - Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
Ruston Storage Compressor Station							
EQT 0001	SN-01 - 4000 hp Compressor Engine	60	32908	3.42		30	548
EQT 0007	SN-19 - Tank Truck Loading						77
EQT 0009	SN-21 - Glycol Deydrator Thermal Oxidizer	21.6	9160	3		48	1500
EQT 0012	SN-26 - 665 hp Caterpillar G399TA Generator Engine	75.1	2840	2.16		20	1040
EQT 0013	SN-25 - Glycol Deydrator Still Column Vent/ Condenser	12	783	1.17			350
EQT 0014	SN-24 - Glycol Deydrator Reboiler	12	783	1.17		30	350
EQT 0015	SN-27 - 500 gal Gasoline Tank						80
EQT 0016	SN-28 - 350 hp Diesel Air Compressor Engine	454.62	1928	.3		10	983
FUG 0001	SN-18 - Fugitive Emissions						77

Relationships:

ID	Description	Relationship	ID	Description
EQT 0009	SN-21 - Glycol Deydrator Thermal Oxidizer	Controls emissions from, Scenario 2	EQT 0013	SN-25 - Glycol Deydrator Still Column Vent / Condenser
EQT 0014	SN-24 - Glycol Deydrator Reboiler	Controls emissions from, Scenario 1	EQT 0013	SN-25 - Glycol Deydrator Still Column Vent / Condenser

Subject Item Groups:

ID	Group Type	Group Description
SCN 0001	Alternate Operating Scenario	Scenario 1 - Use of Glycol Reboiler
SCN 0002	Alternate Operating Scenario	Scenario 2 - Use of Thermal Oxidizer
UNF 0001	Unit or Facility Wide	UNF001 - Ruston Storage Compressor Station

INVENTORIES

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station
Activity Number: PER20090002
Permit Number: 1720-00028-V5
Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 0009	SN-21 - Glycol Deydrator Thermal Oxidizer	SCN000000000002
EQT 0014	SN-24 - Glycol Deydrator Reboiler	SCN000000000001, SCN000000000002

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1470	1470 Recip Nat Gas Comp (2,500 to 5,000 H.P.)	43.5	100 hp

SIC Codes:

4922	Natural gas transmission	UNF 001
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
Ruston Storage Compressor Station															
EQT 0001 SN-01	33.99	40.79	148.88	45.65	54.78	199.95	1.23	1.48	5.38	0.02	0.02	0.08	3.84	4.61	16.82
EQT 0007 SN-19													0.89	0.89	0.01
EQT 0009 SN-21		0.65			0.77			0.06			0.005			0.82	
EQT 0010 SN-22													0.003	0.003	0.01
EQT 0012 SN-26	3.61	4.33	0.90	2.89	3.47	0.72	0.05	0.06	0.01	0.003	0.004	<0.01	0.72	0.87	0.18
EQT 0014 SN-24	0.06	0.06	0.28	0.08	0.08	0.33	0.01	0.01	0.03	0.001	0.001	<0.01		0.78	
EQT 0015 SN-27													0.02	0.02	0.07
EQT 0016 SN-28	2.01	2.01	0.50	3.68	3.68	0.92	0.11	0.11	0.03	0.72	0.72	0.18	0.87	0.87	0.22
FUG 0001 SN-18													0.15	0.15	0.63
SCN 0001 Scenario 1													0.78		3.43
SCN 0002 Scenario 2	0.65		2.83	0.77		3.37	0.06		0.26	0.005		0.02	0.82		3.62

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

- :QT 0009 PM10 Max lb/hr These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
- :QT 0009 SO2 Max lb/hr These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
- :QT 0009 NOx Max lb/hr These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
- :QT 0009 CO Max lb/hr These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
- :QT 0009 VOC Max lb/hr These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
- :QT 0014 VOC Max lb/hr These maximum lb/hr rates represent operation during Scenario 1. Which Months: All Year
- :CN 0001 VOC Tons/Year These emissions are from the Glycol Reboiler (SN-24) and are included in totals for Scenario 1. Which Months: All Year
- :CN 0002 PM10 Tons/Year These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
- :CN 0002 SO2 Tons/Year These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
- :CN 0002 NOx Tons/Year These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
- :CN 0002 CO Tons/Year These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
- :CN 0002 VOC Tons/Year These VOC emissions are from the Thermal Oxidizer (SN-21) and the Glycol Reboiler (SN-24) and are included in totals for Scenario 2. Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 SN-01	1,3-Butadiene	0.03	0.03	0.11
	2,2,4-Trimethylpentane	0.03	0.03	0.12
	Acetaldehyde	0.25	0.30	1.09
	Acrolein	0.25	0.30	1.09
	Benzene	0.06	0.07	0.27
	Ethyl benzene	0.003	0.004	0.02
	Formaldehyde	1.77	2.12	7.74
	Methanol	0.08	0.10	0.35
	Toluene	0.03	0.04	0.13
	Xylene (mixed isomers)	0.01	0.01	0.04
	n-Hexane	0.01	0.02	0.06
EQT 0009 SN-21	Benzene		0.27	
	Toluene		0.14	
EQT 0012 SN-26	Acetaldehyde	0.02	0.02	<0.01
	Acrolein	0.01	0.02	<0.01
	Benzene	0.01	0.01	<0.01
	Formaldehyde	0.11	0.13	0.03
	Methanol	0.02	0.02	<0.01
	Toluene	0.003	0.004	<0.01
EQT 0014 SN-24	Benzene		0.27	
	Toluene		0.14	
SCN 0001 Scenario 1	Benzene	0.27		1.19
	Toluene	0.14		0.62
SCN 0002 Scenario 2	Benzene	0.27		1.19
	Toluene	0.14		0.62
UNF 0001 UNF001	1,3-Butadiene			0.11
	2,2,4-Trimethylpentane			0.12
	Acetaldehyde			1.09
	Acrolein			1.09
	Benzene			1.46
	Ethyl benzene			0.02
	Formaldehyde			7.77
	Methanol			0.35

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0001 UNF001	Toluene			0.75
	Xylene (mixed isomers)			0.04
	n-Hexane			0.06

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

EQT 0009	Benzene	Max lb/hr	These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
EQT 0009	Toluene	Max lb/hr	These maximum lb/hr rates represent operation during Scenario 2. Which Months: All Year
EQT 0014	Benzene	Max lb/hr	These maximum lb/hr rates represent operation during Scenario 1. Which Months: All Year
EQT 0014	Toluene	Max lb/hr	These maximum lb/hr rates represent operation during Scenario 1. Which Months: All Year
SCN 0001	Benzene	Tons/Year	These emissions are from the Glycol Reboiler (SN-24) and are included in totals for Scenario 1. Which Months: All Year
SCN 0001	Toluene	Tons/Year	These emissions are from the Glycol Reboiler (SN-24) and are included in totals for Scenario 1. Which Months: All Year
SCN 0002	Benzene	Tons/Year	These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
SCN 0002	Toluene	Tons/Year	These emissions are from the Thermal Oxidizer (SN-21) and are included in totals for Scenario 2. Which Months: All Year
UNF 0001	Benzene	Tons/Year	equal for both Scenario 1 & Scenario 2. Which Months: All Year
UNF 0001	Toluene	Tons/Year	equal for both Scenario 1 & Scenario 2. Which Months: All Year

SPECIFIC REQUIREMENTS**AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station****Activity Number: PER20090002****Permit Number: 1720-00028-V5****Air - Title V Regular Permit Renewal****EQT 0001 SN-01 - 4000 hp Compressor Engine**

- 1 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 2 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average
- 3 [LAC 33:III.507.H.1.a] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO₂ / ton 100% H₂SO₄, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H₂SO₄ was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity.
Equipment/operational data recordkeeping by electronic or hard copy semiannually. Recorded parameters are NO_x, CO, O₂, SO₂ and VOC concentrations in the stack gas obtained during semiannual testing.
- 4 [LAC 33:III.507.H.1.a] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 5 [LAC 33:III.507.H.1.a] Stack gas concentration: Oxygen monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of O₂ in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified
- 6 [LAC 33:III.507.H.1.a] Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of maximum permitted capacity. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
(Initial test completed on August 13 and 14, 1998).
- 7 [LAC 33:III.507.H.1.a] Stack gas concentration: Carbon monoxide monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified
- 8 [LAC 33:III.507.H.1.a] Stack gas concentration: Nitrogen oxides monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days). Maintain concentrations of NO_x in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

EQT 0009 SN-21 - Glycol Deydrator Thermal Oxidizer

- 10 [40 CFR 64.3(b)(3)] Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications annually. [40 CFR 64.3(b)(3)]
- 11 [40 CFR 64.6(c)(1)] Presence of a flame monitored by visual inspection/determination daily. [40 CFR 64.6(c)(1), LAC 33:III.2116.B.3]
- 12 [40 CFR 64.6(c)(1)] Which Months: All Year Statistical Basis: None specified
Temperature monitored by temperature monitoring device continuously. Exhaust gas temperature is measured continuously using an in line thermocouple. The temperature should be greater than 1500 degrees F. The minimum accuracy is +/- 5 degrees F. [40 CFR 64.6(c)(1)]
- 13 [40 CFR 64.6(c)(2)] Which Months: All Year Statistical Basis: None specified
An excursion or exceedance is defined as the absence of a flame that is not recorded or a missed visual inspection. [40 CFR 64.6(c)(2)]
- 14 [40 CFR 64.6(c)(2)] An excursion or exceedance is defined as a temperature less than 1500 degrees F from the final exhaust of the thermal oxidizer. [40 CFR 64.6(c)(2)]
- 15 [40 CFR 64.7(c)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the thermal oxidizer is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 16 [40 CFR 64.7(e)] Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the VOC emission limitation for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 17 [40 CFR 64.9(a)] Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 18 [40 CFR 64.9(b)(1)] Presence of a flame recordkeeping by logbook continuously. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1), 40 CFR 64.6(c)(4)]
- 19 [40 CFR 64.9(b)(1)] Temperature recordkeeping by logbook continuously. Maintain these records for a period of at least five years. Excursions trigger corrective action, logging and reporting. [40 CFR 64.9(b)(1), 40 CFR 64.6(c)(4)]
- 20 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- 21 [LAC 33:III.1311.C] Which Months: All Year Statistical Basis: None specified
Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

EQT 0009 SN-21 - Glycol Deydrator Thermal Oxidizer

- 22 [LAC 33:III.2103.C] Total suspended particulate <= 0.6 lb/MMBTU of heat input (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 23 [LAC 33:III.2116.B.3] Flare gas: Heat content > 300 BTU/scf.
Which Months: All Year Statistical Basis: None specified

EQT 0010 SN-22 - 285 gal Methanol Storage Tank

- 24 [LAC 33:III.2103.A] Equip with a submerged fill pipe.
- 25 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 26 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0012 SN-26 - 665 hp Caterpillar G399TA Generator Engine

- 27 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 28 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average
- 29 [LAC 33:III.507.H.1.a] Stack gas concentration: Carbon monoxide monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), if the engine operates more than 720 hours during the semiannual period. Maintain concentrations of CO in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified
- 30 [LAC 33:III.507.H.1.a] Stack gas concentration: Oxygen monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), if the engine operates more than 720 hours during the semiannual period. Maintain concentrations of O2 in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

EQT 0012 SN-26 - 665 hp Caterpillar G399TA Generator Engine

- 31 [LAC 33:III.507.H.1.a] Conduct a performance/emissions test, if this engine operates more than 720 hours during the semiannual period: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit and therefore must be conducted at greater than 80% of maximum permitted capacity. Repeat the test after each major engine overhaul. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 32 [LAC 33:III.507.H.1.a] Equipment/operational data recordkeeping by electronic or hard copy semiannually. Recorded parameters are NOx, CO, O2, SO2 and VOC concentrations in the stack gas obtained during semiannual testing, if testing was required.
- 33 [LAC 33:III.507.H.1.a] Submit report: Due within 60 days after performance/emissions test. Submit emissions test results to the Office of Environmental Assessment. The test results summary shall include any necessary conversion into the units of any applicable Standard. (lbs/MMBtu, gr/dscf, lbs SO2 / ton 100% H2SO4, Etc.) Plant and in house laboratory data to support production values shall be included. (Example: how many tons of 100% equivalent H2SO4 was being produced) Units tested at less than 95% of permitted maximum capacity shall provide documentation to support compliance at 100% of the permitted maximum capacity.
- 34 [LAC 33:III.507.H.1.a] Submit notification: Due at least 30 days prior to any LDEQ required performance/emissions test to the Office of Environmental Assessment, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 35 [LAC 33:III.507.H.1.a] Stack gas concentration: Nitrogen oxides monitored by portable analyzer semiannually (six months after the stack test or previous semiannual test, plus or minus 30 days), if the engine operates more than 720 hours during the semiannual period. Maintain concentrations of NOx in the same range as during the initial stack test. Calibrate portable analyzers before each test using a known reference gas sample.
Which Months: All Year Statistical Basis: None specified

EQT 0013 SN-25 - Glycol Dehydrator Still Column Vent / Condenser

- 36 [LAC 33:III.2116.B.1.b] Final exhaust: Temperature < 110 F from the condenser.
Which Months: All Year Statistical Basis: Annual average
- 37 [LAC 33:III.2116.B.2] VOC, Total >= 85 % reduction using a control device. Emissions shall be routed to the reboiler, Emission Point SN-24 or the Thermal oxidizer, Emission Point SN-21 for control.
- 38 [LAC 33:III.2116.F.1] Which Months: All Year Statistical Basis: None specified
Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep records of the number of hours emissions are being routed to the Reboiler, Emission Point SN-24, or the Thermal Oxidizer, Emission Point SN-21.
- 39 [LAC 33:III.2116.F.3] Condenser: Temperature recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2116.F.3.a and b.

EQT 0014 SN-24 - Glycol Dehydrator Reboiler

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

EQT 0014 SN-24 - Glycol Dehydrator Reboiler

- 40 [40 CFR 64.3(b)(3)] Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]
- 41 [40 CFR 64.6(c)(1)] Equipment/operational data monitored by technically sound method continuously. [40 CFR 64.6(c)(1)]
Which Months: All Year Statistical Basis: None specified
- 42 [40 CFR 64.6(c)(2)] An excursion or exceedance is defined as the heat content less than 300 BTU of the gases being controlled at the reboiler. [40 CFR 64.6(c)(2)]
- 43 [40 CFR 64.6(c)(2)] Submit Notification: Submit to DEQ within 5 working days upon the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 44 [40 CFR 64.7(b)] Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 45 [40 CFR 64.7(d)(1)] Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 46 [40 CFR 64.9(b)(1)] Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 47 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified
- 48 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

EQT 0015 SN-27 - 500 gal Gasoline Tank

- 49 [LAC 33:III.2103.A] Equip with a submerged fill pipe.
- 50 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 51 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0016 SN-28 - 350 hp Diesel Air Compressor Engine

- 52 [LAC 33:III.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

EQT 0016 SN-28 - 350 hp Diesel Air Compressor Engine

53 [LAC 33:III.1311.C]

Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
Which Months: All Year Statistical Basis: Six-minute average

FUG 0001 SN-18 - Fugitive Emissions

54 [LAC 33:III.2111]

Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.

SCN 0001 Scenario 1 - Use of Glycol Reboiler

Group Members: EQT 0014

55 [LAC 33:III.501.C.6]

The use of a condenser with noncondensables routed to the reboiler for the control of emissions from the glycol dehydrator still column vent represents Scenario 1.

SCN 0002 Scenario 2 - Use of Thermal Oxidizer

Group Members: EQT 0009EQT 0014

56 [LAC 33:III.501.C.6]

The use of a thermal oxidizer for the control of emissions from the glycol dehydrator still column vent represents Scenario 2.

UNF 0001 UNF001 - Ruston Storage Compressor Station

57 [40 CFR 63.]

All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 1 of 40 CFR 63 Subpart HH.

58 [LAC 33:III.1103]

Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.

59 [LAC 33:III.1303.B]

Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.

60 [LAC 33:III.1305]

Facility-wide: Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.A.1-7.

61 [LAC 33:III.2113.A]

Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.

62 [LAC 33:III.219]

Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station

Activity Number: PER20090002

Permit Number: 1720-00028-V5

Air - Title V Regular Permit Renewal

UNF 0001 UNF001 - Ruston Storage Compressor Station

- 63 [LAC 33:III.507.G.5] Alternate Operating Scenario: Operating plan recordkeeping by logbook upon each occurrence of making a change from one operating scenario to another. Record the operating scenario under which the facility is currently operating. Include in this record the identity of the sources involved, the permit number under which the scenario is included, and the date of change. Keep a copy of the log on site for at least two years. Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard. Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 64 [LAC 33:III.5105.A.1] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.
- 65 [LAC 33:III.5105.A.3] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 66 [LAC 33:III.5105.A.4] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 67 [LAC 33:III.5113.A.1] Submit test results: Due in writing to the Office of Environmental Assessment within 45 days after completion of the test. Submit test results signed by the person responsible for the test.
- 68 [LAC 33:III.5113.A.2] Ensure that all testing done to determine the emission of toxic air pollutants is conducted by qualified personnel.
- 69 [LAC 33:III.5113.B.1] Conduct emission tests as set forth in accordance with Test Methods of 40 CFR, parts 60, 61, and 63 or in accordance with alternative test methods approved by DEQ.
- 70 [LAC 33:III.5113.B.2] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants.
- 71 [LAC 33:III.5113.B.3] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through B.4.e.
- 72 [LAC 33:III.5113.B.4] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 73 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Assessment before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
- 74 [LAC 33:III.5113.B.6] Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 75 [LAC 33:III.5113.B.7] Submit notification: Due to the Office of Environmental Assessment at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 76 [LAC 33:III.5113.C.1] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- 77 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters.
- 78 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii.

SPECIFIC REQUIREMENTS

AI ID: 26802 - CenterPoint Energy Gas Transmission Co - Ruston Storage Station
Activity Number: PER20090002
Permit Number: 1720-00028-V5
Air - Title V Regular Permit Renewal

UNF 0001 UNF001 - Ruston Storage Compressor Station

- 81 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 82 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 83 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 84 [LAC 33:III.5611.B] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 85 [LAC 33:III.919.D] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.
- 86 [LAC 33:III.927] Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:I.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:I.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.